

August 8, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW.,
Washington, D.C. 20204

RE: Notification of Nutritional Support Statements


Dear Sir or Madam:

I hereby notify the Food and Drug Administration (FDA) of the use of statements of nutritional support in the labeling of Vinpocetine, a dietary supplement. Source Naturals® is the manufacturer of Vinpocetine.

Statements being made in the labeling of Vinpocetine:

- (1) Vinpocetine is a derivative of vincamine, a key component of the Lesser Periwinkle plant. Research suggests vinpocetine may improve cognitive performance and short-term memory loss that is sometimes experienced with stress or aging.
- (2) Animal studies have shown that vinpocetine has been shown to significantly increase circulatory parameters including total cerebral blood flow.

To the best of my knowledge, and based upon information and belief present at the time of the executing of this notice, I certify that the above information is accurate and complete. Source Naturals possesses substantiation that the statements are truthful and not misleading.


Ira L. Goldberg
President, Source Naturals®

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